

# EXHIBIT A

IN RE TESLA, INC. SECURITIES LITIGATION  
CASE NO. 18-CV-04865-EMC  
PLAINTIFFS' TRIAL WITNESS LIST

Name	Substance of Testimony	Estimated Length of Testimony
Ahuja, Deepak	Mr. Ahuja will testify regarding, among other things, his experience as Tesla's Chief Financial Officer, his reaction to the August 7, 2018 tweets, discussions with investors regarding the potential going private, his attendance at Tesla board meetings, and his involvement with the August 7, 2018 blog post.	0.75
Arnold, Dave	Mr. Arnold will testify regarding, among other things, to his experience as Tesla's Senior Director of Global Communications, in particular, his conversations with various investors and news outlets following Musk's tweet on August 7, 2018, his familiarity with the topics of public reporting regarding the August 7 <sup>th</sup> tweet, his involvement in the drafting of the August 7, 2018 letter to Tesla employees and the August 13 <sup>th</sup> blog post, and his practice of escalating critical media inquiries and press coverage to Musk, the Tesla Board and senior management.	0.75
Brinkman, Ryan (By Deposition)	Mr. Brinkman will testify regarding, among other things, his professional background and experience as an analyst at JPMorgan, the market's response to Defendants' statements on August 7 and 13, 2018, and considerations behind his decision to initially increase, and later reduce, JPMorgan's price target for Tesla stock.	1.0
Buss, Brad	Mr. Buss will testify regarding, among other things, his experience as a member of Tesla's Board of Directors, the Board's consideration and discussion of Musk's proposal to take Tesla private, Musk's use of Twitter as a means of Tesla marketing, and Tesla's implementation of a disclosure policy relating to Musk's Twitter usage.	0.25

Name	Substance of Testimony	Estimated Length of Testimony
Chew, Aaron	Mr. Chew will testify regarding, among other things, his experience as Tesla's Senior Director of Investor Relations in the summer of 2018, investor feedback on Musk's use of Twitter generally and in particular in August of 2018, his interactions with NASDAQ on August 7, 2018, his correspondence with Tesla investors regarding the August 7, 2018 tweets, and feedback regarding the proposed going private.	0.5
Dees, Dan (By Deposition)	Mr. Dees will testify regarding, among other things, his professional background and experience at Goldman Sachs Group Inc. (GS) and, in particular, his interactions with Musk, the Tesla Board, Silver Lake Partners, and others concerning the proposed take-private transaction, GS's role and engagement as financial advisor, and GS's outreach to potential sources of funding post Elon's August 7, 2018 tweets	0.25
Denholm, Robyn	Ms. Denholm will testify regarding, among other things, her experience as a member of Tesla's Board of Directors, the Board's consideration and discussion of Musk's proposal to take Tesla private, her role and experience as a member of Tesla's audit committee and the Special Committee formed to evaluate Musk's proposal to take Tesla private, her knowledge of Musk's use of Twitter, the Board's knowledge of Musk's use of Twitter, and Tesla's implementation of a disclosure policy relating to Musk's Twitter usage.	0.5
Durban, Egon	Mr. Durban will testify regarding, among other things, his professional background and experience as one of Silver Lake Partner's managing partners, his interactions with Musk and others concerning the proposal to take Tesla private at \$420 per share, the work Silver Lake performed in connection with the going private, and Silver Lake's presentation to the Tesla board on August 23.	0.75

Name	Substance of Testimony	Estimated Length of Testimony
Fath, Joseph (By Deposition)	Mr. Fath will testify regarding, among other things, his professional background and experience as a portfolio manager at T. Rowe Price, his and T. Rowe Price's response to Defendants' statements on August 7 and 13, 2018, T. Rowe Price's ability to invest in Tesla if the proposed going-private transaction were to have occurred, and his meeting with Musk to discuss concerns about Musk's Twitter use.	0.75
Fries, Timothy	Mr. Fries will testify regarding, among other things, his reasons for investing in Tesla, his response to Defendants' statements on August 7 and 13, 2018, and the losses he suffered in Tesla securities due to Musk and Tesla's false statements.	0.5
Gracias, Antonio	Mr. Gracias will testify regarding, among other things, his Valor fund's investment in Tesla and Valor's involvement with Tesla, the nature of his relationship with Musk, his role and experience as a member of Tesla's audit committee, his knowledge of Musk's use of Twitter, the Board's knowledge of Musk's use of Twitter and the economic benefits to Tesla derived from it, and the Board's consideration and discussion of Musk's proposal to take Tesla private.	0.75
Hartzmark, Michael	Dr. Michael Hartzmark will testify regarding the opinions set forth in his expert reports dated September 22, 2020 and November 10, 2021, including, the price and trading of Tesla's securities during the Class Period and the amount of inflation/deflation and damages caused by Defendants' statements on August 7 and 13, 2018.	3.5
Heston, Steven	Professor Steven Heston will testify regarding the opinions set forth in his expert report dated November 8, 2021, including, various pricing models and principles concerning option securities, the changes in the prices and implied volatilities of Tesla options during and around the Class Period, and methods for measuring the	1.0

Name	Substance of Testimony	Estimated Length of Testimony
	impact on Tesla option prices as a result of the alleged misstatements and omissions.	
Koney, Nii Owuraka (By Deposition)	Mr. Koney, will testify regarding, among other things, his professional background and experience as an analyst at Jennison, Musk's prior interest in taking Tesla private, the market's response to Defendants' statements on August 7 and 13, 2018, and his communications with Tesla's investor relations regarding the potential going private.	0.25
Littleton, Glen	Mr. Littleton will testify regarding, among other things, his personal and professional background, including his reasons for investing in Tesla, his response to Defendants' statements on August 7 and 13, 2018, and the losses he suffered in Tesla securities due to Musk and Tesla's false statements.	1.5
Mitts, Joshua	Professor Mitts will testify regarding the opinions set forth in his expert report dated November 8, 2021, including, the market conditions for Tesla stock at and around August 2018, including but not limited to the short interest in Tesla common stock and Musk's conduct and public statements with regard to short investors in Tesla.	0.5
Musk, Elon	Mr. Elon Musk will testify regarding, among other things, his desire to take Tesla private, with whom he had discussed taking Tesla private prior to August 7, 2018, all events preceding and occurring after his tweets on August 7, 2018 concerning his proposal to take Tesla private at \$420 per share, including his conversations with the Saudi PIF and Tesla's Board of Directors, his outreach to Tesla institutional investors after the August 7, 2018 tweets, his usage of Twitter both before and after the August 7, 2018 tweets, the August 13, 2018 blog post, and practices concerning public announcements of past deals.	2.5

Name	Substance of Testimony	Estimated Length of Testimony
Musk, Kimbal	Mr. Kimbal Musk will testify regarding, among other things, his relationship with his brother Elon, his knowledge of his brother's desire to take Tesla private, his experience as a member of Tesla's Board of Directors, the Board's consideration and discussion of Musk's proposal to take Tesla private, and his communications about Musk's tweets on August 7, 2018.	0.5
Polhemus, Rick (By Deposition)	Mr. Polhemus, will testify regarding, among other things, his professional background and experience at Morgan Stanley and, in particular, his work in investment banking, capital raises for Tesla including Tesla's IPO, periodic discussions with Tesla's CFO regarding the company's capital needs, his response as well as Morgan Stanley's response to the potential going private, and Morgan Stanley's involvement with the going private transaction.	0.25
Subramarian, Guhan	Professor Subramanian will testify regarding the opinions set forth in his expert report dated November 8, 2021, including customary practices and procedures in management buyouts as well as his experience with the Dell Inc. buyout, that Musk's conduct with respect to the proposed going private transaction deviated from ordinary practices in the industry and that the proposal to take Tesla private was inter alia illusory.	2.0
Viecha, Martin	Mr. Viecha will testify regarding, among other things, his experience as Tesla's Director of Investor Relations and his conversations with various analysts and investors following Musk's tweets on August 7, 2018.	1.0

\* Plaintiffs' timing estimates may change based on Defendants' cross-examinations and/or rebuttal examinations. Plaintiffs reserve the right to add or subtract witnesses based on developments in the case and to call any witness identified by Defendants on their witness list. Plaintiff will identify the order of testifying witnesses in accordance with the Court's trial protocols.

***IN RE TESLA, INC. SECURITIES LITIGATION***  
**CASE NO. 18-CV-04865-EMC**

**DEFENDANTS' TRIAL WITNESS LIST<sup>1</sup>**

<b><u>Name</u></b>	<b><u>Substance of Testimony</u></b>	<b><u>Estimated Length of Testimony</u></b>
<b>Elon Musk</b>	Mr. Musk is Tesla's founder and CEO. Mr. Musk will testify regarding, among other things, the statements at issue in this case and background related thereto; facts related to the materiality of the statements challenged by Plaintiff, and to whether those statements altered the total mix of information available, including relative to the events that took place between July 31, 2018 and August 17, 2018; the potential go-private transaction and communications related thereto; facts related to the capacity in which Mr. Musk acted when he made communications, including the statements challenged by Plaintiff; facts related to the board's good faith; and facts related to whether the board directly or indirectly controlled Mr. Musk's Twitter account.	~4.0 hours
<b>Sam Teller</b>	Mr. Teller is Tesla's former Director of the Office of the CEO. Defendants expect that Mr. Teller will testify regarding the statements at issue in this case and background related thereto; facts related to the materiality of the statements challenged by Plaintiff, and to whether those statements altered the total mix of information available, including relative to the events that took place between July 31, 2018 and August 17, 2018; and the potential go-private transaction and communications related thereto.	~1.5 hours
<b>Deepak Ahuja</b>	Mr. Ahuja is Tesla's former Chief Financial Officer. Defendants expect that Mr. Ahuja will testify regarding, among other things, the statements at issue in this case and background related thereto; facts related to the materiality of the statements challenged by Plaintiff, and to whether those statements altered the total mix of information available, including relative to the events that took place between July 31, 2018 and August 17, 2018; and the potential go-private transaction and communications related thereto	~1.0 hours

<sup>1</sup> Defendants' timing estimates may change based on Plaintiff's presentation at trial. Defendants reserve the right to add or subtract witnesses based on developments in the case, including any rulings by the Court, and to call any witnesses listed by Plaintiff on his witness list. Defendants intend to counter-designate deposition testimony from any witness presented by Plaintiff by deposition. Defendants reserve the right to call by deposition any listed witness not called live.

<b>Robyn Denholm</b>	Ms. Denholm is a member of Tesla's Board of Directors. Ms. Denholm will testify regarding, among other things, her experience as a member of Tesla's Board of Directors, Mr. Musk's communications with the board regarding the potential go-private transaction, board meetings and communications regarding the potential go-private transaction, facts related to whether the Board of Directors directly or indirectly controlled Mr. Musk's Twitter account, and facts related to whether the Board of Directors acted in good faith.	~0.5 hours
<b>Ira Ehrenpreis</b>	Mr. Ehrenpreis is a member of Tesla's Board of Directors. Mr. Ehrenpreis will testify regarding, among other things, his experience as a member of Tesla's Board of Directors, Mr. Musk's communications with the board regarding the potential go-private transaction, board meetings and communications regarding the potential go-private transaction, facts related to whether the Board of Directors directly or indirectly controlled Mr. Musk's Twitter account, and facts related to whether the Board of Directors acted in good faith.	~0.5 hours
<b>James Murdoch</b>	Mr. Murdoch is a member of Tesla's Board of Directors. Mr. Murdoch will testify regarding, among other things, his experience as a member of Tesla's Board of Directors, Mr. Musk's communications with the board regarding the potential go-private transaction, board meetings and communications regarding the potential go-private transaction, facts related to whether the Board of Directors directly or indirectly controlled Mr. Musk's Twitter account, and facts related to whether the Board of Directors acted in good faith.	~0.5 hours
<b>Kimbal Musk</b>	Kimbal Musk is a member of Tesla's Board of Directors. Mr. Musk will testify regarding, among other things, his experience as a member of Tesla's Board of Directors, Mr. Musk's communications with the board regarding the potential go-private transaction, board meetings and communications regarding the potential go-private transaction, facts related to whether the Board of Directors directly or indirectly controlled Mr. Musk's Twitter account, and facts related to whether the Board of Directors acted in good faith.	~0.5 hours
<b>Antonio Gracias</b>	Mr. Gracias is a former member of Tesla's Board of Directors. Mr. Gracias will testify regarding, among other things, his experience as a member of Tesla's Board of Directors, Mr. Musk's communications with the board regarding the potential go-private transaction, board meetings and communications regarding the potential go-private transaction, facts related to whether the Board of Directors directly or indirectly controlled Mr. Musk's Twitter account, and facts related to whether the Board of Directors acted in good faith.	~0.5 hours



<b>Brad Buss</b>	Mr. Buss is a former member of Tesla's Board of Directors. Mr. Buss will testify regarding, among other things, his experience as a member of Tesla's Board of Directors, Mr. Musk's communications with the board regarding the potential go-private transaction, board meetings and communications regarding the potential go-private transaction, facts related to whether the Board of Directors directly or indirectly controlled Mr. Musk's Twitter account, and facts related to whether the Board of Directors acted in good faith.	~0.5 hours
<b>Linda Johnson Rice</b>	Ms. Johnson Rice is a former member of Tesla's Board of Directors. Ms. Johnson Rice will testify regarding, among other things, her experience as a member of Tesla's Board of Directors, Mr. Musk's communications with the board regarding the potential go-private transaction, board meetings and communications regarding the potential go-private transaction, facts related to whether the Board of Directors directly or indirectly controlled Mr. Musk's Twitter account, and facts related to whether the Board of Directors acted in good faith.	~0.5 hours
<b>Larry Ellison</b>	Mr. Ellison is a former member of Tesla's Board of Directors. Defendants expect that Mr. Ellison will testify regarding the potential go-private transaction and communications related thereto.	~0.5 hours
<b>JB Straubel</b>	Mr. Straubel is a Tesla co-founder and its former Chief Technology Officer. Defendants expect that Mr. Straubel will testify regarding, among other things, the potential go-private transaction and communications related thereto.	~0.5 hours
<b>Egon Durban</b>	Mr. Durban is a Managing Partner at Silver Lake Partners. Defendants expect that Mr. Durban will testify regarding, among other things, the potential go-private transaction and communications related thereto.	~1 hour
<b>Dan Dees</b>	Mr. Dees is Co-Head of Global Investment Banking at Goldman Sachs. Defendants expect that Mr. Dees will testify regarding, among other things, the potential go-private transaction and communications related thereto.	~1 hour
<b>Rick Polhemus</b>	Mr. Polhemus is a Managing Director at Morgan Stanley. Defendants expect that Mr. Polhemus will testify regarding, among other things, the potential go-private transaction and other transactions and communications related thereto.	~1 hour

<b>Daniel R. Fischel</b>	<p>Mr. Fischel has been identified as one of Defendants' expert witnesses, and his opinions are disclosed in his expert reports. Defendants expect Mr. Fischel will testify, among other things, that Mr. Musk's actions in August 2018 were consistent with his prior-stated interest in taking Tesla private and in protecting investors who believed in his vision, it was reasonable to believe that the proposed go-private transaction would have been funded if it moved forward, the \$420 potential offer price was reasonable, and neither Mr. Musk nor the other Defendants benefited from the fraud that Plaintiff alleges.</p> <p>Mr. Fischel will also offer critiques of the opinions of Dr. Hartzmark (should he be permitted to testify), Professor Mitts, and Professor Subramanian.</p>	~2 hours
<b>Amit Seru</b>	<p>Professor Seru has been identified as one of Defendants' expert witnesses, and his opinions are disclosed in his expert reports. Defendants expect Professor Seru will testify, among other things, that Professor Heston's methodology for estimating damages to Tesla option holders is fundamentally flawed in the context of a merger or acquisition deal, and that Professor Heston's other opinions are speculative, unsupported by academic literature, and fail to use actual prices to measure damages.</p> <p>Assuming Dr. Hartzmark is permitted to testify, Defendants expect Professor Seru will testify, among other things, that Dr. Hartzmark's implementation of Professor Heston's methodology is similarly speculative, unreliable, and inaccurate.</p>	~1.5 hours
<b>Yasir Al-Rumayyan</b>	Mr. Al-Rumayyan is the Governor of the PIF, the sovereign wealth fund of the Kingdom of Saudi Arabia. Defendants expect that Mr. Al-Rumayyan will testify regarding the potential go-private transaction and communications related thereto.	~1 hour
<b>Saad Al Jarboa</b>	Mr. Al Jarboa is employed by the PIF. Defendants expect that Mr. Al Jarboa will testify regarding the potential go-private transaction and communications related thereto.	~0.5 hours
<b>Naif Al Mogren</b>	Mr. Al Mogren is employed by the PIF. Defendants expect that Mr. Al Mogren will testify regarding the potential go-private transaction and communications related thereto.	~0.5 hours
<b>Turqi Alnowaiser</b>	Mr. Alnowaiser is employed by the PIF. Defendants expect that Mr. Alnowaiser will testify regarding the potential go-private transaction and communications related thereto.	~0.5 hours

<b>Glen Littleton</b>	Mr. Littleton is the class plaintiff. Defendants plan to cross-examine Mr. Littleton.	~1.5 hours
<b>Guhan Subramanian</b>	Professor Subramanian has been identified as one of Plaintiff's expert witnesses. Defendants plan to cross-examine Professor Subramanian.	~1 hour
<b>Joshua Mitts</b>	Professor Mitts has been identified as one of Plaintiff's expert witnesses. Defendants plan to cross-examine Professor Mitts.	~1 hour
<b>Steven Heston</b>	Dr. Heston has been identified as one of Plaintiff's expert witnesses. Defendants plan to cross-examine Dr. Heston.	~1 hour
<b>Michael Hartzmark</b>	Dr. Hartzmark has been identified as one of Plaintiff's expert witnesses. Defendants plan to cross-examine Dr. Hartzmark.	~2 hours
<b>Timothy Fries</b>	Mr. Fries is on Plaintiff's witness list. Defendants plan to cross-examine Mr. Fries.	~1.5 hours
<b>Dave Arnold</b>	Mr. Arnold is on Plaintiff's witness list. Defendants plan to cross-examine Mr. Arnold.	~0.5 hours
<b>Martin Viecha</b>	Mr. Viecha is on Plaintiff's witness list. Defendants plan to cross-examine Mr. Viecha.	~0.5 hours
<b>Aaron Chew (By Deposition)</b>	Mr. Chew is on Plaintiff's witness list. Defendants plan to cross-examine Mr. Chew.	~0.5 hours
<b>Ryan Brinkman (By Deposition)</b>	Mr. Brinkman is on Plaintiff's witness list. Defendants plan to cross-examine Mr. Brinkman.	~0.5 hours
<b>Joseph Fath (By Deposition)</b>	Mr. Fath is on Plaintiff's witness list. Defendants plan to cross-examine Mr. Fath.	~0.5 hours
<b>Nii Owuraka Koney (By Deposition)</b>	Mr. Koney is on Plaintiff's witness list. Defendants plan to cross-examine Mr. Koney.	~0.5 hours